

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>In re:</b>	<b>Jennifer Lynn Morris</b>	)	
		)	
	<b>Debtors.</b>	)	<b>Case No. 3:10-bk-30187-KRH</b>
		)	<b>Chapter 7</b>
<b>SSN:</b>	<b>xxx-xx-1023</b>	)	
		)	
<b>Address:</b>	<b>10402 Antwerp Rd. N. Chesterfield, VA 23235</b>	)	
		)	
	<b>Jennifer Lynn Morris</b>	)	
	<b>Plaintiff</b>	)	
		)	
<b>v.</b>		)	<b>AP No. 3:24-AP-_____ -KRH</b>
		)	
<b>Virginia Credit Union</b>		)	
		)	
		)	
		)	
	<b>Defendants.</b>	)	
		)	
		)	

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**COMPLAINT**

1. Plaintiff filed for relief under Chapter 7 of the Bankruptcy code January 13, 2010.
2. This Court has original jurisdiction over this action pursuant to 28 U.S.C. 1334.

**BACKGROUND**

3. Virginia Credit Union is an insured depository institution and may be served, pursuant to FRBP 7004(h), by certified mail upon an officer or director at its main office.
4. The CEO of Virginia Credit Union is Christopher M. Shockley.
5. Mr. Shockley may be served at the main office of Virginia Credit Union at 7500 Boulders View Dr, Richmond, VA 23225.
6. Virginia Credit Union filed suit against Jennifer Morris in Richmond City General District Court in 2009, and obtained judgment on May 28, 2009, case number GV09023681-00.

7. The judgment was recorded in the Chesterfield Circuit Court as a lien September 23, 2009 at Book 0275 Page 0557.
8. Virginia Credit Union filed suit against Jennifer Morris in Richmond City General District Court in 2009, and obtained judgment on September 24, 2009, case number GV09049667-00.
9. The judgment was recorded in the Chesterfield Circuit Court as a lien November 16, 2009 at Book 0278 Page 0121.
10. Plaintiff filed a Chapter 7 Bankruptcy in this court on January 13, 2010.
11. Virginia Credit Union was listed and scheduled as an unsecured debt and they were sent notice of the filing on January 15, 2010.
12. Plaintiff did not own any real estate as reflected on Schedule A of the Petition.
13. Virginia Credit Union did not object to the discharge.
14. A discharge was entered on April 28, 2010, and Virginia Credit Union was mailed notice on April 28, 2010.
15. Plaintiff subsequently acquired 10402 Antwerp Rd, N. Chesterfield, VA 23235 in October of 2013, some 3 years after the discharge was entered.
16. Plaintiff recently attempted to refinance the loan, and the lender obtained a title report that reflected the lien.
17. Plaintiff contacted Virginia Credit Union and was told the payoffs were \$1,761.84 and \$14,908.34, which was confirmed in writing.
18. Plaintiff explained that she had filed for Bankruptcy.
19. The letter also states that although the debt is discharged in Bankruptcy, and she had no personal liability, that they were demanding the money to release the liens.
20. Efforts to have Virginia Credit Union release the liens have been unsuccessful, and the refinance has been held up until the issue is resolved.

**REQUEST FOR RELIEF**

1. Plaintiff Jennifer Morris requests that Virginia Credit Union's Judgment liens be declared null and void, and that Virginia Credit Union be held in Contempt for violation of the Discharge in Bankruptcy.

Respectfully Submitted,  
Jennifer Lynn Morris

BY COUNSEL: /s/ Jason M. Krumbein, Esq.  
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